

BY: s/ H. MCDONALD
DEPUTY CLERK

[illegible]

Civil Action No.: ~~4:20-cv-01999~~

3. At the time this action commenced, and at the time of removal, Wal-Mart Stores East, LP, was a Delaware limited partnership with its principal place of business in Bentonville, Arkansas. The partners of Wal-Mart Stores East, LP, are WSE Management, LLC, which is a Delaware limited liability company, with its principal place of business in Bentonville, Arkansas, and WSE Investment, LLC, which is a Delaware limited liability company, with its principal place of business in Bentonville, Arkansas. The sole member of both WSE Management, LLC and WSE Investment,

LLC, is Wal-Mart Stores East, Inc., which is an Arkansas corporation with its principal place of business in Bentonville, Arkansas.

4. The plaintiff has filed a Complaint against the defendants in the Circuit Court for the City of Martinsville, Virginia. A copy of the plaintiff's Complaint and the defendants' Responsive Pleading are attached hereto as **Exhibit A**, pursuant to 28 U.S.C. § 1446.

5. This Joint Notice is filed within thirty (30) days after service upon the defendants and is filed not more than one (1) year after the commencement of this action, pursuant to 28 U.S.C. § 1446(b).

6. This civil action is one over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and the amount in controversy alleged in the Complaint exceeds Seventy-Five Thousand Dollars (\$75,000.00) exclusive of interest and costs, and the action is between citizens of different states.

7. The defendants have given notice of the filing of the Joint Notice of Removal to counsel for the plaintiff and have filed a copy with the Clerk of the Circuit Court for the City of Martinsville, Virginia.

8. The defendants are represented by the same counsel and all join in the removal of this case to this Court.

WHEREFORE, the defendants, by counsel, hereby give notice to this Court that this action is removed to this Court from the Circuit Court for the City of Martinsville, Virginia.

WAL-MART STORES EAST, LP, and
WALMART, INC.

/s/ Victor S. Skaff, III
Of Counsel

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2020, a copy of the foregoing Joint Notice of Removal was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ Victor S. Skaff, III

Of Counsel